

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10306-PBS
)	
TREVOR CHARLTON)	

GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

The United States of America, through its attorneys, Michael J. Sullivan, United States Attorney, and Robert E. Richardson, Assistant U.S. Attorney, hereby requests that the Court ask the following voir dire questions to the jury panel in addition to those questions the Court normally would ask:

1. As jurors, you will be the sole judges of the facts. When I instruct you as to the law, will you have any hesitation in following those instructions, even if you do not agree with the law as I have instructed you?
2. Have you, a family member, or a close friend or business associate ever been involved in a criminal case as either a victim, a witness, or a person charged with a crime? If so, please raise your hand and I will speak with you in private at the side bar.
3. Are you, a family member, or a close friend or business associate involved in the criminal justice system as a prosecutor, a defense attorney, an employee of either a prosecutor or a defense attorney, or as a law enforcement officer? If so, please raise your hand and I will speak with you in private at the side bar.
4. Have you, a family member, or a close friend or business associate had any experience with any police officer, police department, or other law enforcement officer or agency that may influence in any way your consideration of this firearms case?

5. This case is brought against the defendant by the United States of America. Have you, any member of your family, or a close friend ever had any dealings or experiences with the federal government, favorable or unfavorable, that might influence or affect your consideration of this case?
6. The indictment alleges that the defendant, Trevor Charlton, after having previously been convicted of a felony offense, knowingly possessed a firearm and ammunition, in and affecting commerce. Do you have any feelings about guns or gun laws that may affect your ability to judge this case fairly and impartially for both the United States and the defendant?
7. Do you have any beliefs, whether philosophical, religious, or otherwise that would prevent you from or make it difficult for you to pass judgment on another person?
8. Do you have any hearing impairment that may affect your ability to listen to testimony of witnesses?
9. Certain of the witnesses that are expected to testify are law enforcement witnesses. Would you be either more likely or less likely to believe the testimony of a witness merely because that witness is a member of law enforcement?
10. Hollywood produces television programs and movies about crimes and crime-solving police work that can create expectations about how police work is done in a real case and about evidence in a real case in a court of law. While entertaining, such programs and movies should not be used to set standards or expectations about how matters are proved in a real court of law, particularly if those standards or expectations conflict with the instructions that this Court will provide on the applicable law. Is there anyone who could not put aside such expectations and return a true verdict based only on the evidence presented in this courtroom and this Court's instructions on the applicable law?

11. Do you have any difficulty in understanding English that may affect your ability to understand the testimony of witnesses?
12. Do you know of any reason why you cannot sit as a fair and impartial juror in the trial of this case?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/Robert E. Richardson
ROBERT E. RICHARDSON
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I, Robert E. Richardson, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 25, 2007.

/s/Robert E. Richardson
ROBERT E. RICHARDSON